

Hon. Richard J. Sullivan
April 22, 2008
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New York City Transit

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April 22, 2008

BY DHL

Hon. Richard J. Sullivan
United States District Court
Southern District of New York
500 Pearl Street, Rm. 615
New York, New York 10007

Re: Johnson v. Metropolitan Transit Authority, et al.

03 CV 5805

07

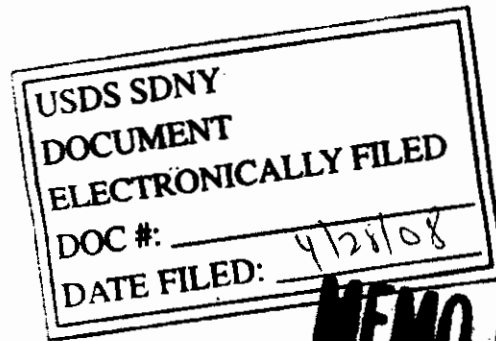
Dear Judge Sullivan:

On behalf of Defendants Metropolitan Transit Authority ("MTA"), Manhattan and Bronx Surface Transit Operating Authority ("MABSTOA"), and David Collum, I write to request an extension of the discovery deadlines in the above referenced case. Counsel for Plaintiff, Michael Lumer, consents to this request. This is Defendants' first request for an extension.

Plaintiff alleges she suffers from post traumatic stress disorder as a result of her conversation with Mr. Collum. Consequently, before deposing Plaintiff, we need to obtain her medical records. As soon as we received the appropriate medical releases, requests for records were sent to six doctors in March. To date, we have only received records from one doctor. As a result, we seek additional time to obtain the medical records and to depose Plaintiff.

Currently, the deposition deadline is scheduled for May 2, requests to admit are scheduled for May 3, all discovery is scheduled to be completed by June 17, pre-motion letters are scheduled for June 30, responses are scheduled for July 7, and a conference is scheduled for July 23. We request a 60 day enlargement of time to complete these tasks. The proposed schedule is as follows:

Deposition Deadline:	July 2, 2008
Requests to Admit:	July 3, 2008
Pre-Motion Letters:	July 30, 2008
Response:	August 7, 2008
Conference:	August 22, 2008

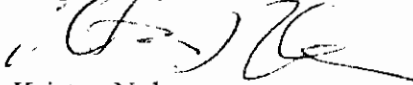


MEMO ENDORSED

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I apologize for any inconveniences and thank you for your consideration in this matter.

Respectfully submitted,




Kristen Nolan

cc:

Michael Lumer
Reibman & Weiner
26 Court St.
Brooklyn, NY 11242

The request for an extension is granted.
The Case Management Plan is
amended as provided above. The court
shall hold a post-discovery status
conference on August 22, 2008 at 10:00a.m.


sd ordered Richard J. Sullivan
Date: 4/24/08 Richard J. Sullivan
U.S.D.